1	ALVERSON, TAYLOR,
2	ALVERSON, TAYLOR, MORTENSEN & SANDERS
	LEANN SANDERS, ESQ.
3	Nevada Bar No. 000390
	7401 W. Charleston Boulevard
4	Las Vegas, Nevada 89117
_	Las Vegas, Nevada 89117 Telephone: (702) 384-7000
5	efile@alversontaylor.com
6	Attorneys for Defendants
`	

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

>0<

KATHY REGENT and ROBERT REGENT,

JR., Husband and Wife;

Plaintiffs,

vs.

ZIMMER, INC., a foreign corporation,
ZIMMER US, INC., a foreign corporation,
ZIMMER HOLDINGS, INC., a foreign
corporation, and DOES I through 100,
inclusive,

Defendants.

<u>UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE ANSWER</u>

The defendants, Zimmer, Inc., Zimmer US, Inc., and Zimmer Holding, Inc., (together, "Zimmer"), respectfully move the Court for an extension of time to file their answer to the Complaint, up to and including June 10, 2015. In support of its Motion, Zimmer states as follows:

The plaintiffs, Kathy Regent and Robert Regent, Jr. ("Plaintiffs"), filed their
 Complaint on March 9, 2015, in the District Court of Clark County, Nevada. Plaintiffs allege

LS #22603

1	product liability claims related to an orthopedic medical device.
2	2. Plaintiffs served the Complaint and Summons on
3	2015.
4	3. Zimmer removed the case to this court on May 1.
5	4. Zimmer's current responsive pleading deadline is
6	which time has not expired.
7	5. Due to the extensive length of the Complaint, and
8	. ,
9	allegations therein, Zimmer requires additional time to prepare i
10	6. Counsel for Zimmer has contacted Plaintiffs' cou
11	oppose the requested enlargement.
12	7. Zimmer states that this Motion is not made for th
13	rather in an effort to allow it time to fully respond to the Comple
14	WHEREFORE, Zimmer respectfully moves the Court for
15	and including June 10, 2015, to answer or otherwise respond to
16	DATED this 19 day of May, 2015.
17	
18	ALVERSON, TAYLOR, I
19	_
20	By Lind and
21	LEANN SANDER
22	Nevada Bar No. 00 7401 West Charles
23	Las Vegas, Nevada Telephone: (702)
24	Attorneys for Defer
25	
26	
27	
28	2

Plaintiffs served the Complaint and Summons on Zimmer on or about April 13,

Zimmer removed the case to this court on May 13, 2015.

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- Zimmer's current responsive pleading deadline is no earlier than May 20, 2015, ne has not expired.
- Due to the extensive length of the Complaint, and the complexity of the as therein, Zimmer requires additional time to prepare its response to the Complaint.
- Counsel for Zimmer has contacted Plaintiffs' counsel, and Plaintiffs do not e requested enlargement.
- Zimmer states that this Motion is not made for the purpose of undue delay, but an effort to allow it time to fully respond to the Complaint.

HEREFORE, Zimmer respectfully moves the Court for an enlargement of time, up to ding June 10, 2015, to answer or otherwise respond to the Complaint.

ALVERSON, TAYLOR, MORTENSEN & SANDERS

LEANN SANDERS, ESO.

Nevada Bar No. 000390

7401 West Charleston Boulevard

Las Vegas, Nevada 89117

Telephone: (702) 384-7000 Attorneys for Defendants

	Case 2:15-cv-00894-JCM-VCF Document 6 Filed 05/21/15 Page 3 of 6
1	CERTIFICATE VIA CM/ECF
2	Pursuant to FRCP 5, I hereby certify that I am an employee of ALVERSC
3	MORTENSEN & SANDERS and that on the 20th day of May, 2015, I caused to
4	CM/ECF a true and correct copy of UNOPPOSED MOTION FOR EXTENSION
5	
6	TO FILE ANSWER on the following:
7	
8	Peter C. Wetherall, Esq. WETHERALL GROUP, LTD.
9	9345 W. Sunset Road, Suite 100 Las Vegas, NV 89148
10	Attorneys for Plaintiff
11	
12	Wence Canean
13 14	An Employee of
15	ALVERSON, TAYLOR, MORTENSEN & S
16	
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CERTIFI	CATE	VIA	CM/FCF
VIII III	111111111111111111111111111111111111111	7 1 7	THE PARTY OF THE P

Pursuant to FRCP 5, I hereby certify that I am an employee of ALVERSON, TAYLOR, MORTENSEN & SANDERS and that on the 20th day of May, 2015, I caused to be served via CM/ECF a true and correct copy of UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE ANSWER on the following:

ALVERSON, TAYLOR, MORTENSEN & SANDERS

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1	IT IS SO ORDERED that Zimmer shall have up to, and including, June 10, 2015, to file
2	their answer.
3	DATED this $\frac{21st}{}$ day of $\frac{May}{}$, 2015.
4	
5	Contacto
6	U.S. DISTRICT COURT JUDGE
7	Magistrate
8	Respectfully Submitted by:
9	ALVERSON, TAYLOR, MORTENSEN & SANDERS
10	
11	
12	LEANN SANDERS, ESQ.
13	Nevada Bar No. 000390
14	7401 West Charleston Boulevard Las Vegas, Nevada 89117
15	Telephone: (702) 384-7000 Attorneys for Defendants
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 20	

Case 2:15-cv-00894-JCM-VCF Document 6 Filed 05/21/15 Page 5 of 6

COPIES TO:

2	1
-	Peter C. Wetherall, Esq.
3	WETHERALL GROUP, LTD.
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0	Attorneys for Defendants

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